

1 PAUL J. PASCUZZI, State Bar No. 148810
JASON E. RIOS, State Bar No. 190086
2 THOMAS R. PHINNEY, State Bar No. 159435
FELDERSTEIN FITZGERALD
3 WILLOUGHBY PASCUZZI & RIOS LLP
500 Capitol Mall, Suite 2250
4 Sacramento, CA 95814
Telephone: (916) 329-7400
5 Facsimile: (916) 329-7435
Email: ppascuzzi@ffwplaw.com
6 jrios@ffwplaw.com
tphinney@ffwplaw.com

7 ORI KATZ, State Bar No. 209561
8 ALAN H. MARTIN, State Bar No. 132301
SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
9 A Limited Liability Partnership
Including Professional Corporations
10 Four Embarcadero Center, 17th Floor
San Francisco, California 94111-4109
11 Telephone: (415) 434-9100
Facsimile: (415) 434-3947
12 Email: okatz@sheppardmullin.com
amartin@sheppardmullin.com

13 Attorneys for The Roman Catholic
14 Archbishop of San Francisco

15 UNITED STATES BANKRUPTCY COURT

16 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

17 In re
18 THE ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO,

19 Debtor and
20 Debtor in Possession.

Case No. 23-30564

Chapter 11

**NOTICE OF FILING REVISED FORM OF
PROPOSED ORDER GRANTING
DEBTOR'S APPLICATION TO EMPLOY
TRANSPERFECT LEGAL SOLUTIONS TO
PROVIDE LITIGATION SUPPORT
CONSULTING AND E-DISCOVERY
SERVICES UNDER BANKRUPTCY CODE
SECTIONS 327(a) AND 328(a)**

[No Hearing Required]

Judge: Hon. Dennis Montali

26 **PLEASE TAKE NOTICE** that on January 19, 2024, the Roman Catholic Archbishop of
27 San Francisco (the "Debtor" or "RCASF"), the debtor and debtor in possession in the above-
28

1 captioned bankruptcy case (the “Bankruptcy Case”) filed the *Debtor’s Application to Employ*
2 *TransPerfect Legal Solutions to Provide Litigation Support Consulting and E-Discovery Services*
3 *Under Bankruptcy Code Sections 327(a) and 328(a)* [ECF No. 433] (the “Application”).¹
4 Thereafter, Tracy Hope Davis, United States Trustee for Region 17 (the “UST”), by and through
5 her counsel of record, reached out to the Debtor’s counsel and provided comments on the proposed
6 form of order granting the Application. The Debtor has considered the UST’s comments, consulted
7 with TransPerfect, and determined to request entry of the modified form of proposed order appended
8 to this notice as Exhibit 1.

9 **PLEASE TAKE FURTHER NOTICE** that a redline comparison of the revised proposed
10 form of order and the original form of proposed order of which the Application sought court
11 approval is appended to this notice as Exhibit 2.

12 Dated: February 6, 2024

FELDERSTEIN FITZGERALD
WILLOUGHBY PASCUZZI & RIOS LLP

13
14 By /s/ Paul J. Pascuzzi
15 PAUL J. PASCUZZI
16 JASON E. RIOS
17 THOMAS R. PHINNEY
Attorneys for The Roman Catholic
Archbishop of San Francisco

18
19 Dated: February 6, 2024

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

20
21 By /s/ Ori Katz
22 ORI KATZ
23 ALAN H. MARTIN
Attorneys for The Roman Catholic
Archbishop of San Francisco

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28 ¹ Capitalized terms not defined herein shall have the meanings given to them in the Application.

Exhibit 1

[Revised Form of Proposed Order]

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

In re

THE ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO,

Debtor and
Debtor in Possession.

Case No. 23-30564

Chapter 11

**[PROPOSED] ORDER GRANTING
DEBTOR'S APPLICATION TO EMPLOY
TRANSPERFECT LEGAL SOLUTIONS TO
PROVIDE LITIGATION SUPPORT
CONSULTING AND E-DISCOVERY
SERVICES UNDER BANKRUPTCY CODE
SECTIONS 327(a) AND 328(a)**

[No Hearing Required]

Judge: Hon. Dennis Montali

The Court, having read and considered the *Debtor's Application to Employ TransPerfect Legal Solutions to Provide Litigation Support Consulting and E-Discovery Services Under Bankruptcy Code Sections 327(a) and 328(a)* (the "Application"),² filed by the Roman Catholic Archbishop of San Francisco (the "Debtor" or "RCASF"), the debtor and debtor in possession in the above-captioned bankruptcy case (the "Bankruptcy Case") on January 19, 2024 [ECF No. 433], and the accompanying declaration of David Brill in support thereof, and good cause appearing therefor,

² Capitalized terms not defined herein shall have the meanings given to them in the Application.

1 IT IS HEREBY ORDERED that:

2 1. The Application, as modified by this Order, is APPROVED.

3 2. The Debtor is authorized to employ TransPerfect Document Management, Inc. and
4 Chancery Staffing Solutions, LLC (d/b/a TransPerfect Staffing Solutions), together known as
5 TransPerfect Legal Solutions ("TransPerfect") as its litigation support consultant and e-discovery
6 vendor to provide the Services under Bankruptcy Code sections 327(a) and 328(a), and Bankruptcy
7 Rule 2014(a), effective as of December 21, 2023.

8 3. TransPerfect is authorized to perform the Services described in the Application and
9 the Engagement Agreement attached as Exhibit 1 to the Brill Declaration.

10 4. Notwithstanding any provision in the Engagement Agreement to the contrary,
11 approval of the Application shall not alter the result dictated by the holding in *Baker Botts L.L.P. v.*
12 *ASARCO LLC*, 135 S. Ct. 2158, 2169 (2015) and its construction of 11 U.S.C. § 330(a)(1).

13 5. Notwithstanding any provision in the Engagement Agreement to the contrary,
14 approval of the Application shall not entitle TransPerfect to interest on unpaid invoices.

15 6. Notwithstanding any provision in the Engagement Agreement to the contrary,
16 approval of the Application shall not entitle TransPerfect to indemnity for claims arising from its
17 own gross negligence, bad faith or willful misconduct."

18 ***END OF [PROPOSED] ORDER***
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Exhibit 2

[Redline Comparison of Revised Form of Proposed Order
and Original Form of Proposed Order]

PAUL J. PASCUZZI, State Bar No. 148810
JASON E. RIOS, State Bar No. 190086
THOMAS R. PHINNEY, State Bar No. 159435
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WILLOUGHBY PASCUZZI & RIOS LLP
500 Capitol Mall, Suite 2250
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Telephone: (916) 329-7400
Facsimile: (916) 329-7435
Email: ppascuzzi@ffwplaw.com
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tphinney@ffwplaw.com

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UNITED STATES BANKRUPTCY COURT

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**[PROPOSED] ORDER GRANTING
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SERVICES UNDER BANKRUPTCY CODE
SECTIONS 327(a) AND 328(a)**

[No Hearing Required]

Judge: Hon. Dennis Montali

The Court, having read and considered the *Debtor's Application to Employ TransPerfect
Legal Solutions to Provide Litigation Support Consulting and E-Discovery Services Under*

1 *Bankruptcy Code Sections 327(a) and 328(a)* (the “Application”),¹ filed by the Roman Catholic
2 Archbishop of San Francisco (the “Debtor” or “RCASF”), the debtor and debtor in possession in
3 the above-captioned bankruptcy case (the “Bankruptcy Case”) on January ~~19~~, 2024, ~~as Docket~~
4 ~~[ECF No. 433]~~, and the accompanying ~~Declaration~~declaration of David Brill in support thereof,
5 and good cause appearing therefor,

6 IT IS HEREBY ORDERED that:

7 1. The Application, as modified by this Order, is APPROVED.

8 2. The Debtor is authorized to employ TransPerfect Document Management, Inc. and
9 Chancery Staffing Solutions, LLC (d/b/a TransPerfect Staffing Solutions), together known as
10 TransPerfect Legal Solutions (“TransPerfect”) as its litigation support consultant and e-discovery
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21 approval of the Application shall not entitle TransPerfect to indemnity for claims arising from its
22 own gross negligence, bad faith or willful misconduct.”

23 ***END OF [PROPOSED] ORDER***

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| Summary report: Litera Compare for Word 11.4.0.111 Document comparison done on 2/6/2024 3:23:53 PM | |
| Style name: SMRH Standard | |
| Intelligent Table Comparison: Active | |
| Original DMS: nd://4890-9390-4803/1/RCASF - Order Granting Application to Employ TransPerfect.docx | |
| Modified DMS: nd://4890-9390-4803/2/RCASF - Order Granting Application to Employ TransPerfect.docx | |
| Changes: | |
| Add | 16 |
| Delete | 8 |
| Move From | 0 |
| Move To | 0 |
| Table Insert | 0 |
| Table Delete | 0 |
| Table moves to | 0 |
| Table moves from | 0 |
| Embedded Graphics (Visio, ChemDraw, Images etc.) | 0 |
| Embedded Excel | 0 |
| Format changes | 0 |
| Total Changes: | 24 |